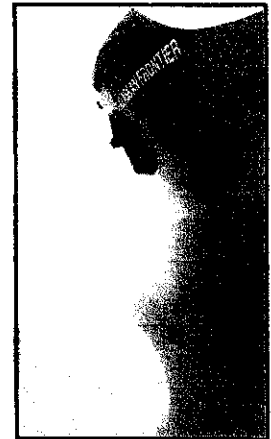


**KVAK Radio
Community Service**

LOCAL NEWS

Valdez news is produced locally by KVAK and airs three times daily every weekday. With our remote location and only one weekly newspaper, the people of Valdez count on KVAK for local news and events. With discussion on opening ANWR and the state of Alaska moving toward building a Natural Gas Pipeline, leaders and lawmakers had a lot to talk about on KVAK.

Forty percent of the nation's domestic crude oil is produced in Alaska and sent down the 800-mile pipeline that ends in Valdez. Since tankers load in the Port of Valdez, security levels are heightened and residents look to KVAK to provide security announcements and information from government officials and the Coast Guard. KVAK conducts regular interviews with our State House Representative, John Harris, while Senate is in session, we meet with local school and government leaders on a weekly basis.



Weekly Interview Schedule

| | |
|--|---|
| Valdez City Manager – John Hozey School Superintendent – Lance Buie Nat'l Weather Service Rep – Mr. Bailey Athletic Director (HS) – Todd Wegner | <u>School Principals</u> (Different one each week) Roz Strang (Elementary) Rod Morrison (Jr. High) Geary Cantrell (High School) |
|--|---|

There are many serious issues to cover in Valdez, but KVAK works hard to balance our newscasts with positive stories about accomplishments of citizens and students in our community. In the past year we featured countless stories on the arts, education, health and other issues important to our listeners. KVAK also conducts a Question of the Week poll to allow the public feedback on community topics and events and Steve Floyd of KFAR in Fairbanks produces our statewide news. His 10 minute Alaska newscast is sent to us via e-mail every weekday and airs two times each day.

WEATHER

In a place where we have gale warnings, five feet of snow in a couple hours, winds to 70 mph and a wind chill factor to 50 below, weather forecasts are imperative to our listeners. Our local and marine weather forecasts play hourly and our winter travel forecast airs every morning and evening, seven days a week. There is only one road out of Valdez and it traverses from our town at sea level through the mountains of Thompson Pass that rise to an elevation of 2,750 feet. Weather can be mild in town, while an avalanche and road closures are brewing just 20 miles away. KVAK staff gets calls at all hours of the day to notify citizens of these conditions and routinely broadcasts special weather statements. Station Manager, Laurie Prax, has a studio at home and can access computers at the station remotely to get an announcement on the air in less than 5 minutes.

VALDEZ CITY COUNCIL & SCHOOL BOARD MEETINGS

Every Monday night, the City Council or Valdez School Board hold meetings at Council Chambers and KVAK broadcasts them live on our station. Meetings are two to five hours long and condensed meeting agenda's are broadcast on air a few days prior.

KVAK Radio
Community Service

ALYESKA PIPELINE / KVAK KIDS CLUB

The goal of our Kids Club is to engage young children in activities aimed at promoting community service. Children in Kindergarten through 6th grade can join the club and receive the following:



- Welcome Packet
- On-Air Birthday Announcement
- Birthday Card with Free Ice Cream Drink
- Quarterly Newsletters
- 4th through 6th graders can participate in community service recordings



The main component of the Kids Club is the community service announcements read by 4th through 6th graders. Each month KVAK picks a different community service theme, writes community announcements and invites Kids Club members in 4th through 6th grade to participate in a recording session at the studio. The :30 to :60 second spots, read by Kids Club members, are aired on KVAK throughout the month. We typically write, edit and produce 15 to 20 announcements and conduct two recording sessions each month. The Kids Club community service messages air a minimum of 3 times daily, everyday on both our 93.3FM and 1230AM stations.

KVAK Radio employs the assistance of high school mentors to assist with recording sessions and help with our Kids Club Kudos reward program. In addition to our community service announcements, student volunteers read all Kids Club recording session and birthday announcements. Kids Club membership for 2005-2006 school year was 150 students and is currently at 160 for the 2007-2008 school year.

Sponsorship by Alyeska Pipeline Service Company pays for operational expenses of program such as paper; printing, postage and staff time. KVAK donates a minimum of \$12,960 each year in airtime for public service announcements (\$1,080 each month).

BUCCANEER BROADCAST

A visit to KVAK each week to produce a weekly news show is part of the curriculum for the Communications Technology class at Valdez High School. After a series of in-class lectures by a KVAK staff member and a tour of the studio, students are welcomed into the studio to read the stories they have written and assist with production of the report. In addition, teachers and administrators can e-mail announcements to the class for inclusion in the Buccaneer Broadcast Schedule of Events that airs on KVAK three days each week. There is no charge to the school for this program and KVAK contributes airtime.

ON THE TRAIL

Avid snowmobile enthusiast, Mike Buck, converses with KVAK's Laurie Prax each week in this 4-minute weekly feature. Topics covered in this program include current conditions, ride reports, equipment recommendations, safety tips and Valdez Snowmachine Club announcements.

KVAK Radio
Community Service

HIGH SCHOOL SPORTS



KVAK broadcasts play-by-play of every varsity basketball game both home and away. And when you live in Valdez, away usually means a six hour drive to play a game. There is one high school in our town and our closest opponent is 120 miles away. The team takes a six hour ferry ride to play against Cordova each year, routinely drives to Fairbanks (360 miles) and Anchorage (306 miles) and usually endures a 10 hour drive to the Peninsula or might drive, fly and take a ferry to play a team along the Inside Passage. With travel expenses eating the lion's share of sponsorship dollars, KVAK relies on volunteer play-by-play announcers, solicits accommodation and travel sponsors and works with other stations to get games to the airwaves.



In 2007, KVAK broadcast 52 basketball games, 3 football games, 6 volleyball matches and 4 baseball games. That's more than 100 hours of LIVE play-by-play! In addition, KVAK donates a minimum of \$273 each year to Booster Clubs for the following teams: Basketball; Volleyball; Football; Cheerleading; Softball; Baseball; Wrestling; and Swimming (Airtime Value: \$2,184).

SENIOR SPOTLIGHTS

How many radio stations would interview all the graduating high school seniors within their listening audience? KVAK does! In 2007, we interviewed 72 graduating seniors about their plans for the future and aired them during the month of May. It takes a lot of time to edit all those interviews, but everyone in town loves it and the museum preserves the audio for reunions.

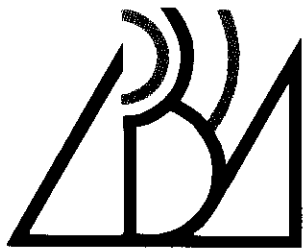
VALDEZ FISHING REPORT

One of our most popular features is the Valdez Fishing Report. Short interviews conducted by KVAK staff members feature: fishing tips; facts about different species found in Prince William Sound; Fish Derby standings; and some whopping fish tales. The program airs 4x daily June, July and August. Daily audio reports are e-mailed and aired on three stations in Fairbanks. During the summer of 2007, we broadcast 387 features with original content in Valdez and sent 78 original programs to Fairbanks.

PUBLIC SERVICE ANNOUNCEMENTS

KVAK airs national public service announcements and takes pride in assisting local non-profit organizations. In 2007, we met with Advocates for Victims of Violence to help them develop and air an awareness campaign for many of their local programs (Airtime Value: \$1,200), met with business leader to write and produce 12 radio spots to promote shopping locally (Airtime Value: \$2,800), we ran a different Parent Tip feature 3x daily every weekday as a public service (\$1,080 monthly value) and donated time to many school events and community fund-raisers.

The value of airtime donated to national PSA's averaged more than \$1,000 a month in value and our local public service time easily matched that \$1,000 a month value. We routinely announce, free of charge birth, memorial service and lost pet announcements. This year marked a new milestone for KVAK, as we helped re-unite a lost chicken and its owner. In the summer, we run emergency locate messages for the Police to help find visitors to town who need to know of an emergency back home. In the wintertime, we even remind people to shovel the snow off their boats so they won't sink.



Alaska Broadcasters Association

"Membership Has Its Benefits"
An Alaskan Corporation

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April 17, 2008

Dear Chairman Martin,

The Alaska Broadcasters Association represents 94 Radio and 21 TV stations. The owners and operators in our great state provide local service that addresses the unique concerns we have in Alaska.

Our stations are committed to providing local content and feel the ideas and methods set forth in the FCC's Localism Notice of Proposed Rulemaking (MB Docket No. 04-233) would not accomplish more "localism". In fact, the time required to fulfill the requirements, coupled with the financial burdens many of these mandates carry would be counter-productive to the FCC's "localism" goals.

With ipods, satellite radio and the web, our industry faces more competition than ever. These competing technologies are having a direct impact on how stations conduct business and are driving those stations that aren't already local to move in that direction. We encourage you to consider the positive aspects new technology has on our business. The technologies available today make it possible for stations to do more things with less money. In Alaska, for instance, our many small stations utilize technology to operate unattended overnight and allocate resources to more local concerns.

In response to the FCC's proposed rules, our association conducted a 22 question survey and we will share some of the results of that survey with you in this letter. We are also enclosing station profiles to illustrate how broadcasters serve the public at a very high level. In these summaries you will see local Radio and TV stations that go well above and beyond current or proposed government regulations.

UNATTENDED OPERATION

Our association conducted a survey regarding localism and determined that 100 percent of our members currently engage in some form of unattended operation and 100 percent of our members do not support the FCC changing localism rules to no longer allow unattended operation. The attended operation proposal would, most assuredly, impact many of our stations as the average number of full-time employees for the Alaska stations surveyed is 8 and the average number of part-time employees per station is 3.5.

When asked what they would do if stations were not allowed to operate unattended, some said they would have to go off the air overnight. Most said they would have to reallocate employees currently working on news and other community projects which would ultimately be detrimental to localism efforts.

EMERGENCY PREPAREDNESS

There is an assumption of a cause and effect relationship between live bodies at a studio and the ability to serve throughout MB Docket 04-233. Assuming the goal of mandating attended operation is to achieve better localism and the ability to serve the public in the event of an emergency, here are some things to think about:

- Emergencies are best handled by managers and news professionals who can be reached at home or via cell phone and who can access programming via technology, rather than an entry level person being paid minimum wage to baby sit the studio overnight
- Technology allows reliable access to radio stations from a remote location.
- The EAS system automatically takes over stations immediately and broadcast alerts. This happens "manned or unmanned".
- Every station in Alaska has invested in an EAS system and routinely runs tests. State and Federal Governments should work with broadcasters to improve and expand the current EAS system to better serve all of our communities.
- Running unattended overnight has allowed us to re-allocate funds to better serve our community on a consistent daily basis.

Our members strongly believe each licensee should have the flexibility to develop its own individual "Plan of Action" that best fits its unique situation for handling the broadcast of emergency information during unattended hours of operation.

All of the Alaska broadcast stations surveyed currently maintain direct contact with local and state public safety officials and feel confident they can be contacted should the need arise to alert the public to emergency health/safety concerns.

REPORTING REQUIREMENTS AND VOICE TRACKING

Our stations diligently fill out the reports and forms currently required and they are rarely, if ever, reviewed by the FCC or the general public. One member commented in their survey, "Why waste valuable staff time filling out forms when our community can be better served by having our personnel work on things that actually make a difference to our listeners".

Eighty six percent of stations responding to our survey currently air music from local artists, but only 35 keep records of those performances. Several respondents said they would discontinue carrying local music if reporting of such became too burdensome.

In our survey, members also made several comments about the FCC's assumption that "voice tracking" is a bad thing. One member commented, "Voice tracking can free up local staff people from having to sit unproductively before a microphone playing music, when they can be working on a news story, recording interviews with public officials, etc."

INVOLVEMENT IN LOCAL COMMUNITIES / ADVISORY BOARDS

While we found that more than half of the Alaskan stations surveyed currently consult with formal "advisory boards" already, the ones that didn't employed solicited feedback in other informal and innovative ways. There are many opportunities to utilize new technologies like the internet for more interaction with the public and we anticipate our members will embrace and utilize new technologies to reach their listeners. We maintain the belief our members are currently communicating effectively with our communities. We would hate to see the current methods of working with communities jeopardized by the FCC mandating and directing our "method" of contact with the public.

As individual stations and as a state broadcast association, we have not done enough to share the positive aspects of our operations. We hope the following survey results illustrate the whole picture.

- How many visitors come to your station in ONE YEAR to discuss dissatisfaction with your program content or to recommend program changes
Average # of people per YEAR – 8
- How many visitors come to your station in the average MONTH to be a part of your programming (news interviews, community figures, etc.) or to seek on-air help with an educational campaign, project or fundraiser (ie: non-profits, church groups, etc.)
Average # of people per MONTH – 86

IN SUMMARY

In summary, we feel the proposed localism rules are not necessary and do not serve to increase localism. The "one size fits all" approach to localism presented in MB Docket No. 04-233 is amazingly insensitive to the financial and time constraints of small market stations. The majority of stations in Alaska are small and if the proposed rules move forward they could be devastating to broadcasting in our great state.

Sincerely,



Laurie Prax, ABA Vice President

Cc: FCC Commissioners; Copps, Adelstein, Tate and McDowell
FCC Media Bureau Senior Deputy Chief, Roy Stewart
Senator Ted Stevens
Senator Lisa Murkowski
Congressman Don Young
Jane Mago, NAB



Voice for Christ Ministries
P.O. Box 174, Nenana, Alaska 99760
Tel: (907) 832-5450
Fax: (907) 832-5450
www.vcm.org

The I AM Radio Network
"Christian Radio for Alaska"

April 14, 2008

Federal Communications Division
Media Bureau
Audio Division

RE: MB DOCKET NO. 04-233

Voice for Christ Ministries (VFCM) is a Christian non-profit organization, located in Nenana, Alaska. The mission of VFCM is to provide Christian radio for Native and Rural Alaskans. To accomplish that mission, VFCM owns and operates the "I AM Radio Network". This radio network is made up of 3 radio stations and 15 translators in primarily underserved rural communities across the state.

The radio stations include:

1. KAGV 1110AM – Houston/Big Lake, AK
2. KIAM 630AM – Nenana, AK
3. KYKD 100.1FM – Bethel, AK

STUDIO LOCATED IN COMMUNITY OF LICENSE

In terms of the proposal to require that main studios be physically located in a station's community of license, this rule, if adopted would create an undue hardship for VFCM directly impacting KAGV 1110AM.

We own the radio studio building, transmitter building, and 15 acres of land associated with this station where our AM tower is erected in Houston, Alaska. In order to move our studio building we would need to sell our current studio property, as well as purchase new land and an appropriate building or re-build in the unincorporated community of Big Lake, Alaska. New land in Big Lake would need to have a southeast facing side as the majority of our radio programming is delivered via satellite.

It has been documented that property prices in the community of Big Lake are as much as 41% higher than in the neighboring city of Houston. We would also need to purchase and install equipment for a STL to transmit our programming the approximate 16 mile difference between the studio location in Big Lake and the transmitter location in Houston.

In terms of public access, our current studio location in Houston, is directly off of one of three highways in the state of Alaska. Whereas, if our studio were located in Big Lake, it would have the potential to be less accessible to the public.

ELIMINATE UNATTENDED OPERATION OF BROADCAST STATIONS

Being a non-profit mission organization in rural Alaska, it is difficult for VFCM to recruit and keep staff. Currently we have 3 full-time staff members who along with 4 consistent part-time volunteers, maintain our three radio stations and 15 translators located across the state. If the FCC were to eliminate unattended operation of radio stations, VFCM would be forced to significantly reduce broadcast time.

One scenario for VFCM to comply with such a ruling would likely include the stopping of overnight broadcasting at KAGV1110AM and KYKD100.1FM and attempt to staff KIAM630AM through the night as KIAM is the network feed to the translators. The lack of overnight unattended broadcasting at KAGV1110AM and KYKD100.1FM would mean that at a minimum overnight weather recorded forecasts, local Native church service programming, as well as EAS transmissions would cease to exist at night.

Comments in Response to Localism Notice of Proposed Rulemaking MB Docket No. 04-233
I submit the following comments in response to the Localism Notice of Proposed Rulemaking
(the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

I was four months pregnant with a four-year old and six year-old sleeping soundly in bed when our community experienced massive flooding that took out the only road to our community October 2006. My husband was on the other side of the road and didn't make it home until two days after the flood hit.

I own two small radio stations in Valdez, Alaska and our town has a population of 4,300 people. I have one full-time staff person beside myself and three to four part-time employees. Many of the technologies mentioned in Docket No. 04-233 as detrimental to localism are the very technologies that enabled me to serve my community during the flood.

I was not at the studio at 10pm when I received a call on my cell phone about the flooding. I recorded an announcement at home, logged into the computers at work and had the announcement on the air in less time than it would have taken me to drive to the station (and I live only three blocks away).

There are several proposals in MB Docket No. 04-233 that would seriously jeopardize the way I am able to serve my community and I hope to shed light on those as they relate to a small market and give suggestions on a few other ways to achieve your goals of more localism.

First, and foremost, I believe that if a broadcaster is not community-minded enough to provide local content on their own, competition is the best motivator. Funny I mention that when I own the only commercial stations in my market. I have lots of competition as my listeners can choose to listen to their i-pod, other internet radio stations and surf the web. When the issue of localism was first introduced in 2003, many new technologies were not as pervasive. I think the Commission must consider that competing technologies are already having a direct impact and are serving to promote localism on radio stations in 2008.

After reading my story, it might seem that a person to man the studio 24 hours a day would be a great idea. Fact of the matter is, I cannot afford it. And the person I would have to hire at \$10 an hour to work the overnight shift is not the person I want making decisions about what goes on the air during an emergency situation.

Rather than requiring a warm body, I would support requiring stations to have a list of local contacts in the area and an Emergency Plan in place that illustrates how the stations will respond in the event of an emergency. In many cases the plan can be as simple as leaving a cell phone number on the main studio telephone message and ensuring there is an on-call person to respond in the event of an emergency.

I think there is a misconception that "Voice Tracking" is a bad thing also. In our small community, voice tracking is absolutely brilliant and one of the many tools in our arsenal that make us more local. Voice tracking simply means you record something to put on the air at a later time. In our case, we voice track important weather announcements and insert them into our programming to bring our listeners updated information like avalanche warnings and road closures. We also voice track a local news program that airs three times daily.

The other assumption that seems to be made is that LIVE radio is local radio. If I was LIVE 24 hours a day on my two stations, the announcers would have to be volunteers and my stations would be horrendous. I use a music service and insert local news and announcements throughout the day. When

we do LIVE, we have a purpose and we strive to do it well. I don't see how requiring anything LIVE translates to more local content.

The Alaska Broadcasters Association is working pro-actively on our EAS system and it is a much better service in 2008 than it was in 2003. In our state, receiving updates from the National Weather Service has been a great advancement. The Commission should require EAS to be operational and a part of a community localism plan. If the idea of a "Community Advisory Boards" are advanced, I would like to see the boards put together by the station and recorded as part of our "Localism Plan". We have many advisory boards in our community and the majority of them are well-intentioned but highly ineffective. When the flood hit our community, our station became the hub of communication for the DEC, Department of Transportation, Police, Fire, Alyeska Pipeline Service Company and the City of Valdez. We found that our business contacts allowed us to gather information from grocery stores regarding food supplies, gas companies regarding supply and other non-governmental businesses. In fact, following the flood, we put together a book of contacts that we passed along to government agencies.

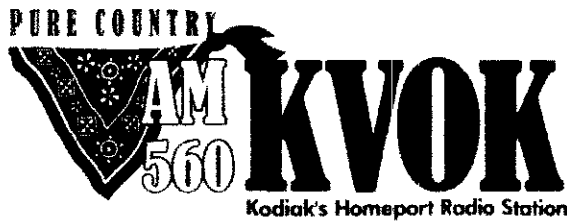
With regard to notifying the public of our obligation to serve the community, I would respectfully request that the requirements not be burdensome on stations. I would encourage you to look into utilizing systems all stations currently have in place. If you require public notice, make it a :30 or :60 second spot that we can enter into our traffic system and can automatically generate a report that proved the spot aired (these affidavits can be generated at the end of the month when we generate them for our clients).

I have built my business on localism and encourage your efforts to try to bring more local content to the airwaves, however I am concerned that the regulations being proposed might be so burdensome on small stations that they actually lower the amount of community service we are able to do.

Radio stations are like children. The majority of them are well-mannered and try to follow the rules while a few misbehave and do as little as possible. Let's support regulations that reinforce the behavior of good stations and utilize technology to make reporting simple and easy so it can be learned and implemented by all.

Best Regards,

Laurie Prax
KVAK AM & FM
PO Box 367
Valdez, AK
907-835-5825
907-255-5825 (cell)



To Whom It May Concern,

As the owner of 2 rural radio stations in Kodiak, Alaska, I am painfully aware of the critical nature of providing local news coverage and the life and death elements of timely, locally produced weather updates. Kodiak has no other local media other than radio and my stations represent the only commercial stations providing these elements to the town of Kodiak and the adjoining Coast Guard installation.

The recent FCC NPRM considering the requirement of local advisory boards (we already have one - 14,000 local listeners, many of which visit the studio each week and provide real-time feedback), the elimination of unattended operation of my radio stations (a move that would eviscerate my ability to maintain live and local news and public affairs programming in order to pay for overnight facility babysitters) and the establishment of programming requirements as part of license renewal (these, as yet unnamed, requirements smack a bit of government programming of local radio) will only damage the small, rural broadcaster's ability to provide the very local content these rules seek to protect.

I strenuously request these measures not move further into a rulemaking. Not having lived in the beltway, one can only wonder what shortcomings back East have led to this consideration. Take it from a small operator, these draconian considerations will cost jobs and local services - not add them.

With Respect,

Scott K. Smith